



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

MAY 20 2004

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Washington, D.C. 20590

Mr. John Foglio
Manager Hazardous Materials
Transportation Safety
Degussa Corporation
379 Interpace Parkway
P.O. Box 677
Parsippany, NJ 07054-0677

Ref. No. 03-0246

Dear Mr. Foglio:

This responds to your letter regarding the inspection of portable tanks under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether it is permissible to use a video camera when performing an internal visual inspection under the periodic testing requirements of § 180.605. I apologize for the delay in responding.

The answer is yes. Section 180.605(g) specifies an internal visual inspection must ensure that the portable tank shell is inspected for pitting, corrosion, or abrasions, dents, distortions, defects in welds or any other conditions, including leakage, that might render the portable tank unsafe for transportation. In addition, the piping, valves, and gaskets must be inspected for corroded areas, defects, and other conditions, including leakage, that might render the portable tank unsafe for filling, discharge, or transportation. A video camera may be used to perform a visual internal inspection of a portable tank provided all of the internal areas can be viewed in a manner equivalent to that which would be expected if viewed directly by a person inside the tank.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards



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180.605

Sep-17-03 12:38pm

From-DEGUSSA CORP

T-441 P.01/01 F-949

Stevens
\$180.605
Portable Tanks
03-0246

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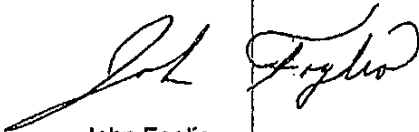
Re: Inspection of Portable Tanks

Dear Mr. Mazzullo,

I have been informed that it is not absolutely necessary for someone to physically enter an intermodal tank in order to perform the internal examination that is required once every 2.5 or 5 years. In the interest of safety, we would like to limit the practice of having someone physically enter the tank to perform that examination, if possible. We would like to perform that inspection by using a camera which is capable of detecting pitting, corrosion, or abrasions, dents, distortions, defects in welds or any other conditions, including leakage, that might render the portable tank unsafe for transportation.

Before doing so we would like confirmation that this is an acceptable method of performing an internal examination. Please advise. Thank you.

Sincerely,



John Foglio
Manager Hazardous Materials
Transportation Safety